

# EXHIBIT A

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Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (S.D.N.Y.) (GBD) (SN); *Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-01922 (S.D.N.Y.) (GBD) (SN); *Estate of John P. O'Neill, Sr., et al. v. Republic of the Sudan, et al.*, No. 18-cv-12114 (S.D.N.Y.) (GBD) (SN)

Dear Counsel:

Anderson Kill represents Plaintiffs in the above-captioned lawsuits against the Kingdom of Saudi Arabia ("Kingdom") and the Republic of the Sudan ("Sudan"). We write regarding the Court's recent order denying class certification in *Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-cv-1923 (S.D.N.Y.) (GBD) (SN) (hereinafter "*Al Baraka*"). ECF No. 9243. In an abundance of caution and without prejudice, we recently filed notices to conform adding the Kingdom<sup>1</sup> and Sudan into

<sup>1</sup> Except those Anderson Kill clients already on complaints against the Kingdom in the following cases: *Estate of John P. O'Neill, Sr. et al. v. Kingdom of Saudi Arabia, et al.*, No. 1:04-cv-01922 (GBD)(SN); *Lloyd A. Abel Sr., et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11880 (GBD)(SN); *Margarite Bonomo, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11885 (GBD)(SN); *William*

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suits brought by all of Anderson Kill's 9/11 clients even though the class action claims against the Kingdom and Sudan have not been dismissed. We seek to meet and confer about the implications of the class decision in *al Baraka* on the class cases against the Kingdom and Sudan and on the timing for putative class members to be added against the Kingdom and Sudan by short form complaint, amendment, or notice to conform.

We are available to meet early next week. Thank you for your attention to this matter.

Regards,

/s/ Jerry S. Goldman

Jerry S. Goldman

cc:

Ethan Greenberg, Esq. (via email)

Bruce Strong, Esq. (via email)

Alex Greene, Esq. (via email)

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*Cintron-Lugos a/k/a William Cintron, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11888 (GBD)(SN); *David DeConto, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11904 (GBD)(SN); *Stephanie E. Lang, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11926 (GBD)(SN); *David Gordenstein, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11941 (GBD)(SN); *Arthur Harris, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11946 (GBD)(SN); *Allison Garger, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11950 (GBD)(SN); *Rodney Bush, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11964 (GBD)(SN); *Queen Mercer, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11965 (GBD)(SN); *Michael Murray, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11966 (GBD)(SN); *Mario Perez, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11967 (GBD)(SN); *Hopeton Richards, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11969 (GBD)(SN); *Deborah Rooney, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11970 (GBD)(SN); *Barbara Carroll Spence, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-11971 (GBD)(SN); *Gordon Aamoth, Sr., et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12270 (GBD)(SN); *Richard A. Deuel, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12272 (GBD)(SN); *Kristian G. Kincaid, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12273 (GBD)(SN); *Ana Pascual Ortiz, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12274 (GBD)(SN); *Michael Stackpole, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12275 (GBD)(SN); *Jack Zelmanowitz, et al. v. Kingdom of Saudi Arabia*, No. 1:18-cv-12381 (GBD)(SN).